## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
VS.	)	No. 15-04013-01-CR-C-BCW
CAMERON JAMES STOUT,	)	
Defendant.	)	

## UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL

Comes now defendant, Cameron James Stout, by counsel Troy K. Stabenow, and moves this Court, pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B), to remove this case from the scheduled trial docket and to continue this case until the August, 2015, trial docket.

## **SUGGESTIONS IN SUPPORT**

- 1. Mr. Stout is currently in custody awaiting trial.
- 2. On April 13, 2015, the government representative in this case, Mr. Jim Lynn, Assistant United States Attorney, indicated that the United States does not oppose a delay.
- 3. This continuance is not sought for purpose of dilatory delay, but is sought in truth and fact so that the defendant may fully investigate the case and adequately prepare for trial.
- 4. In accordance with 18 U.S.C. § 3161(h)(8)(A) and (B)(iv), it is submitted that a continuance outweighs the best interests of the public and the defendant to a speedy

trial, which is required by 18 U.S.C. § 3161(c)(1). Under the provisions of 18 U.S.C. § 3161(h)(8)(A), the period of time until the requested criminal trial docket setting should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial Act.

WHEREFORE, defendant, Cameron James Stout, respectfully requests this Court, pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B), to continue this case until the August, 2015, trial docket, or to any other subsequent date which this Court deems appropriate.

Respectfully submitted,

/s/ Troy K. Stabenow

TROY K. STABENOW, # 57067 Assistant Federal Public Defender 221 Bolivar Street, Suite 104 Jefferson City, Missouri 65101 (573) 636-8747 Attorney for Defendant

April 17, 2015

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of April, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case, and a copy was mailed, via the United States Postal Service, to all non-CM/ECF participants.

/s/ Troy K. Stabenow TROY K. STABENOW